

**Wilson, Ryan (CRT)**

---

**From:** Savitsky, Zoe (CRT)  
**Sent:** Friday, June 08, 2012 3:52 PM  
**To:** Holmes Adams; John Compton  
**Cc:** Wilson, Ryan (CRT)  
**Subject:** For next week

Holmes and John,

As Ryan noted, thank you again for providing the names and order of deponents.

In terms of the proposed protective order, would it address your concern if, rather than "all teacher names," the clause referred to "teacher names in teacher improvement plans and similar personnel documents, and in documents created by teachers, including, but not limited to, teacher logs, parent logs, discipline logs, behavior notebooks, and other such similar documents"?

We also wanted to raise with you the language in the protective order which states that the information will only be used for the purpose of this litigation. As you know, the Civil Rights Division's Special Litigation Section (SPL) has noticed an investigation of the Meridian Police Department and of the Lauderdale County Youth Court. When SPL requested information from the District, you referred them to the data and information you had already provided to us in Educational Opportunities Section. As such, we propose revising the proposed protective order to make clear that information may be shared with authorized DOJ attorneys and staff in SPL for purposes of their review. We are happy to ask them if they would be willing to sign the protective order as well if you desire.

Again, as mentioned in our June 7, 2012 email, Lori Rifkin, the attorney who is handling the SPL investigation described above, is planning to observe the 30(b)(6) depositions next week. During those depositions, we may introduce exhibits that contain information defined as confidential under the protective order, so we would like to resolve this as quickly as possible. Please let us know your thoughts.

Best,

Zoe

---

Zoe M. Savitsky  
Trial Attorney  
U.S. Department of Justice, Civil Rights Division  
Educational Opportunities Section, PHB 4300  
950 Pennsylvania Ave., NW  
Washington, DC 20530

Ph: (202) 305-3223 | Fx: (202) 514-8337